



BellSouth Telecommunications, Inc.
601 W. Chestnut Street
Room 407
Louisville, KY 40203

Dorothy.Chambers@BellSouth.com

Dorothy J. Chambers
General Counsel/Kentucky

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June 15, 2005

RECEIVED

JUN 16 2005

PUBLIC SERVICE
COMMISSION

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

CASE 2005-00229

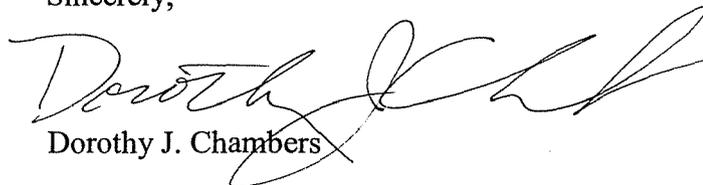
Re: Notice BellSouth Telecommunications, Inc., of Intent to Disconnect
Phone Link, Inc., Pursuant to GSST A5.8, Emergency Service Continuity Plan

Dear Ms. O'Donnell:

The attached filing provides the Commission advance notice of BellSouth's intent to disconnect Phone Link, Inc. ("Phone Link"), pursuant to the Commission's May 20, 2003, Order in Case No. 2002-0310 and GSST A5.8, Emergency Service Continuity Plan.

Portions of the information set out in the filing contain confidential, commercial information. Pursuant to 807 KAR 5:001, Section 7, enclosed is a Confidentiality Petition asking the Commission to grant confidential status to the highlighted information in the filing.

Sincerely,



Dorothy J. Chambers

cc: Phone Link, Inc.
Attn: Ms. Annette Lee

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EDITED

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
JUN 16 2005
PUBLIC SERVICE
COMMISSION

In the Matter of:

NOTICE OF BELL SOUTH)
TELECOMMUNICATIONS, INC., OF INTENT)
TO DISCONNECT PHONE LINK, INC.,)
PURSUANT TO GSST A5.8, EMERGENCY)
CONTINUITY PLAN)

CASE NO. 2005-00229

CONFIDENTIALITY PETITION
PURSUANT TO 807 KAR 5:001 SECTION 7

Petitioner, BellSouth Telecommunications, Inc., ("BellSouth"), hereby moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission"), pursuant to KRS 61.878 and 807 KAR 5:001, § 7, to classify as confidential the highlighted information contained in the letter to Elizabeth O'Donnell from Joan Coleman dated June 15, 2005, and the letter to Phone Link, Inc., from BellSouth dated May 18, 2005. The highlighted portions of the letters contain information specific to Phone Link, Inc. ("Phone Link").

The Kentucky Open Records Act exempts certain information from the public disclosure requirements of the Act, including certain commercial and also information the disclosure of which is prohibited by federal law or regulation. KRS 61.878(1)(c)1 and 61.878(1)(k). To qualify for the commercial information exemption and, therefore, keep the information confidential, a party must establish that disclosure of the commercial information would permit an unfair advantage to competitors and the parties seeking confidentiality if openly discussed. KRS 61.878(1)(c)1; 807 KAR 5:001 § 7. The Commission has taken the position that the statute and rules require the party

to demonstrate actual competition and the likelihood of competitive injury if the information is disclosed.

The material for which BellSouth seeks confidential treatment in the portion of the letters identified above contains commercially valuable information. All of the information identified therein has potential value to other participants in the local exchange market, such as incumbent local exchange carriers (ILECs), competitive access providers (CAPs), facilities-based competitive local exchange carriers (CLECs), cable companies who have developed or are contemplating the development of wholesale or retail network products, and wireless providers.

The highlighted information also contains customer-specific information. Information provided to the Commission concerning specific customers is CPNI¹ and should not be publicly disclosed without the approval of the individual customers. Disclosure of customer-specific information is subject to obligations under Section 222 of the Federal Law. Federal law imposes the obligation to maintain the confidentiality of such information ("the 222(a) obligation"). KRS 61.878(1)(k), specifically exempts records or information from public disclosure when the disclosure of such information or records is prohibited by federal law or regulation. Therefore, because CPNI is protected from disclosure by federal law, this information should be afforded proprietary treatment.

Public disclosure of the identified information would provide competitors with an unfair competitive advantage. The Commission should also grant confidential treatment to the information for the following reasons:

¹ Customer Proprietary Network Information

- (1) The information for which BellSouth is requesting confidential treatment is not known outside of BellSouth.
- (2) The information is not disseminated within BellSouth and is known only by those of BellSouth's employees who have a legitimate business need to know and act upon the information;
- (3) BellSouth seeks to preserve the confidentiality of this information through all appropriate means, including the maintenance of appropriate security at its offices; and
- (4) By granting BellSouth's petition, there would be no damage to any public interest.

For the reasons stated herein, the Commission should grant BellSouth's request for confidential treatment of the identified information.

Respectfully submitted,



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675 W. Peachtree St., N.E.
Atlanta, GA 30375
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COUNSEL FOR BELL SOUTH
TELECOMMUNICATIONS, INC.



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Joan A. Coleman
Vice President
Regulatory & External Affairs

502-582-2167
Fax 502-582-2140

June 15, 2005

Ms. Elizabeth O'Donnell
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, Kentucky 40602-0615

Dear Ms. O'Donnell:

Pursuant to the Kentucky PSC's May 20, 2003 order in KY PSC Case No. 2002-0310, BellSouth is providing advance notice to the Kentucky Public Service Commission (PSC) of BellSouth's intent to disconnect Phone Link, Inc. ("Phone Link") for non-payment.

BellSouth's records indicate that Phone Link is delinquent in payment of its bills to BellSouth. As of June 3, 2005, is overdue for services provided in Kentucky to Phone Link. Attempts to collect past due amounts from Phone Link have been unsuccessful. BellSouth made numerous written notifications to Phone Link informing them of BellSouth's intent to suspend or terminate services consistent with the terms and conditions of the Resale Agreement between Phone Link and BellSouth. Attached is BellSouth's written notice to Phone Link. At the time of this notice was overdue for services provided in Kentucky to Phone Link. As of today, BellSouth has received no payment from Phone Link and we seek to begin discontinuance of services no later than June 30, 2005. Disconnection of Phone Link services will affect approximately of its Kentucky customers.

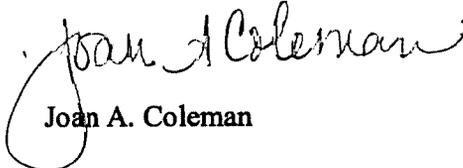
Under terms of their Resale Agreement, Phone Link is solely responsible for notifying its end users of the proposed service disconnection. BellSouth is copying Phone Link to remind them of their obligation to notify their end users of this situation regarding pending disconnection of services.

Should the Commission determine the need to invoke BellSouth's Emergency Service Continuity Tariff, BellSouth will take steps to notify the affected end users and inform them that they may continue to receive telecommunications services through The Emergency Services Continuity Plan for a minimum of fourteen (14) days and that the end user must transition to a new service provider.

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Should you or the staff have any questions concerning this filing or need additional information, Mike Hayden, of my staff, is familiar with this matter and can be reached on (502) 582-8180.

Very truly yours,



Joan A. Coleman

cc: Phone Link, Inc.
Attn: Ms. Annette Lee

EDITED

May 18, 2005

Phone Link, Inc.
Attention: Ms. Annette Lee
230 Yager Avenue
Suite 3
LaGrange, Kentucky 40031

PLEASE REMIT PAYMENT TO:

BellSouth
Attention: PRO-CABS
250 Williams Street NW
Suite 5020 NW
Atlanta, Georgia 30303

Dear Ms. Lee:

Revision to the letter dated May 11, 2005, the collectible amount has changed in the state of Kentucky. Several attempts to collect past due amounts from Phone Link have been unsuccessful and to date full payment has not been received. Phone Link's account is currently in default in the amount of [REDACTED] and subject to disconnection. Pursuant to the Resale Agreement between BellSouth Telecommunications, Inc. and Phone Link consider this letter written notice that BellSouth will proceed with the discontinuance of existing services in Kentucky on May 23, 2005. Pursuant to the Agreement, it is Phone Link's responsibility to notify its end users of this impending disconnection. In addition, if any of Phone Link's end users have a Local Service Freeze this freeze will be removed at the time of discontinuance to give the end user the ability to choose a new local provider.

In order to continue services, Phone Link must pay, in immediately available funds, the present undisputed balance in the sum of [REDACTED] to BellSouth. Also, payments are expected for any current charges that may become due before May 23, 2005. If service is interrupted, full non-recurring charges will be applicable to reestablish service. In addition, if there is an outstanding request for new or additional security, that request will need to be addressed before service is re-established.

If you have questions regarding your account, please contact your Collections Service Representative, Debra Harris, at (205) 714-5850, Extension 6 -7489.

Sincerely,

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